



**THE CITY OF NEW YORK
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February 12, 2024

By ECF

Honorable Denny Chin
U.S. Court of Appeals for the Second Circuit
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

Re: Pitre v. City of New York, et al., 18-CV-5950 (DC)

Your Honor:

We are Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants in the above-referenced action. We write, with Plaintiff's consent, to request an extension of the briefing schedule set by Your Honor's Memorandum and Order dated January 29, 2024 on Docket #138. Specifically, we request the following deadline extensions:

- i. Plaintiff and Defendants motions extended from February 16, 2024 to March 1, 2024;
- ii. All opposition papers extended from March 1, 2024 to March 15, 2024; and
- iii. All Reply papers extended from March 8 to March 22, 2022.

The reason for the instant request is that the undersigned attorneys have many other professional obligations in the month of February.¹ Many of which were previously adjourned to accommodate participation in the *Pitre* trial.² Additionally, Maria DeCastro, who also served as

¹ Ms. Silver is currently preparing for a multiple week trial that begins mid-march in the Southern District of New York in the matter of *Adams-Florres v. City, et al.*, 18-cv-12150 (JMF), has discovery responses due in multiple matters, and has a mediation and multiple court conferences for other matters.

² Ms. Alexander is preparing witnesses for a trial scheduled to commence on March 4, 2024, in the matter of *Colon v. City, et al.*, 16-cv-04540 (VSB) (OTW), has expert depositions scheduled for February 20, 21, and 22 as well as expert discovery due in the matter *Ahmad v. NYU Langone et al.*, 22 cv 1248 (GWG)

a member of the trial team, will shortly be departing the law department and has other obligations to attend to prior to her departure.³

We thank the Court for its attention in this matter.

Respectfully Submitted,

s/ Lauren F. Silver

Lauren F. Silver
Assistant Corporation Counsel

s/ Desiree Alexander

Desiree Alexander
Assistant Corporation Counsel

cc: Counsel of Record (By ECF)

(JLR) by March 1, 2024, has a motion to dismiss due on March 1, 2024 in the matter of *Simon v. DOE, et al* 23-CV-7796 (EK) (CLP), has a motion to dismiss on *Glowatz v. City et al.* 159914/2023 due February 23, 2024 has opposition and reply papers due February 15, 2024 in the matter of *Caiaccia v. DOE, et al.*, 158238/2023, and an Answer to the Complaint due February 23, 2024 on *Saint-Jean v. City et al.* 158748/2023.

³ Ms. DeCastro has a motion for summary judgment reply due February 26, 2024, has multiple court conferences, and has an opposition to motions *in limine* due February 23, 2024.